

**IN THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF ILLINOIS,  
EASTERN DIVISION**

ALICE WASHINGTON,  Plaintiff,  v.  OFFICE OF THE STATE APPELLATE DEFENDER,  Defendant.	Case No. 1:12-CV-08533  Honorable Rebecca R. Pallmeyer
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**SCHEDULE B**  
**PARTIES' AGREED DESCRIPTION OF THE CASE**  
**TO BE READ TO PROSPECTIVE JURORS**

Plaintiff, Alice Washington, is an African -American and was employed by Defendant, Office of the State Appellate Defender (hereinafter "OSAD") from January 2, 1997 through February 4, 2008. Defendant OSAD, an agency of the State of Illinois, has offices located throughout Illinois. Plaintiff Washington's work location while employed with OSAD was its Chicago Office.

Plaintiff Washington began her employment with OSAD in the Post-Conviction Unit (hereinafter "PCU") as a mitigation specialist, but the position title was later changed to Forensic Social Historian. The PCU handled cases of capital defendants who were appealing their criminal convictions. In April of 2003, Plaintiff Washington was temporarily assigned to the Death Penalty Trial Assistance Unit (hereinafter "DPTA Unit"). The DPTA Unit assisted indigent criminal defendants that had active litigation that could lead to a sentence of death. Beginning in April of 2003, Plaintiff Washington was supervised by Deputy Defender of the DPTA Unit, Stephen

Richards, and the Chief Investigator of the DPTA Unit, Edward Watkins. In July of 2007, Plaintiff Washington was officially transferred to the DPTA Unit.

Michael Pelletier was appointed State Appellate Defender on January 1, 2008. Susan Carr, Director of Support Services, conducted a Needs Assessment and Evaluation Survey of OSAD's support staff throughout OSAD's offices statewide. On or about January 3, 2008, Plaintiff Washington completed the Needs Assessment and Evaluation Survey that was administered by Susan Carr.

On or around January 18, 2008, Michael Pelletier placed Plaintiff Washington on the Investigator's pay schedule and removed Plaintiff from the Forensic Social Historian's pay schedule. This placement changed Plaintiff Washington's annual salary from \$60,000 to \$49,400. On January 30, 2008, Plaintiff Washington filed an internal grievance with OSAD regarding the change in her annual salary from \$60,000 to \$49,400. On February 4, 2008, Michael Pelletier gave Plaintiff Washington the option to resign or be terminated.

Plaintiff alleges discrimination in that because she is African-American her annual salary was reduced and she was forced to resign or be terminated from her employment with OSAD. Also, Plaintiff alleges that after she filed an internal grievance with OSAD regarding the change in her annual salary, OSAD retaliated against her by forcing her to resign or be terminated from her employment with OSAD. Plaintiff Washington seeks damages she incurred as a result of these allegedly illegal actions.

Defendant denies that it discriminated or retaliated against Plaintiff Washington or that any actions were taken for any illegal reasons. Defendant further contends Plaintiff is not entitled to any relief.